

securities or tip others so that they could purchase or sell any Eon Labs securities while possessing such information.

110. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase Eon Labs securities and the profits from those purchases would be shared between them. As described above and in connection with this agreement, Pajcin purchased Eon Labs securities while in possession of this misappropriated, material, non-public information, as set forth on the annexed Exhibit A, which is incorporated herein by reference.

111. Also in violation of their respective obligations, Plotkin and Pajcin tipped Lopandic and Verinac to trade in Eons Labs securities while expecting to benefit from the disclosure. Plotkin and Pajcin also agreed to share kickbacks received from Lopandic and Verinac for providing this information.

112. Lopandic and Verinac knew, or were reckless in not knowing, that the information they learned about the tender offer for Eon Labs from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or sell any Eon Labs securities or tip others so that they could purchase or sell any Eon Labs securities while possessing such information.

113. Notwithstanding their obligations, Lopandic and Verinac tipped the Direktanlage Traders to trade in Eon Labs securities while expecting to benefit from their disclosure.

114. The Direktanlage Traders knew, or were reckless in not knowing, that the information they learned about the tender offer for Eon Labs from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of

trust or confidence, and that they could not purchase or sell any securities while possessing such information.

115. Notwithstanding their obligations, as described above, the Direktanlage Traders purchased Eon Labs securities while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

116. By the conduct described above, Defendants Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 [17 C.F.R. § 240.10b-5] thereunder.

117. Shpigelman, Pajcin, and Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in Eon Labs securities. Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage Traders trading in Eon Labs securities.

COUNT III

(Trading in Eon Labs Securities in Violation of Section 14(e) of the Exchange Act and Rule 14e-3 thereunder as to Defendants Shpigelman, Pajcin, and Plotkin)

118. Paragraphs 1 through 117 are realleged and incorporated herein by reference.

119. By February 17, 2005, Novartis had taken a substantial step or steps to commence a cash tender offer to purchase the outstanding public shares of Eon Labs.

120. Beginning on or about February 17, 2005, Shpigelman, Pajcin, and Plotkin had engaged directly or indirectly in fraudulent, deceptive or manipulative acts or practices in connection with the tender offer for Eon Labs' stock by (i) purchasing or causing to be purchased the securities of Eon Labs while in possession of material, non-public information related to the tender offer, which information they knew, or were reckless in not knowing, was obtained

directly or indirectly from the companies involved in the transactions or a person acting on behalf of one or more of the companies; or (ii) communicating to others material non-public information relating to the tender offer for Eon Labs' stock, under circumstances in which it was reasonably foreseeable that such communications were likely to result in the purchase or sale of the securities of Eon Labs.

121. By reason of the foregoing, Shpigelman, Pajcin, and Plotkin directly and indirectly, violated Section 14(e) of the Exchange Act [15 U.S.C. § 78n(e)] and Rule 14e-3 thereunder [17 C.F.R. § 240.14e-3].

COUNT IV

(Trading in Cinergy Securities in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, Borac, and the Direktanlage Traders)

122. Paragraphs 1 through 121 are realleged and incorporated herein by reference.

123. Prior to the public announcement of the acquisition of Cinergy by Duke on May 9, 2005, information relating to the offer to acquire Cinergy was material, non-public information. This information also was considered confidential by Merrill Lynch, and was intended solely for internal corporate use on behalf of its client, Cinergy.

124. Shpigelman learned of the material, non-public information concerning Duke's offer to acquire Cinergy in the course of his employment at Merrill Lynch. Shpigelman further knew, or was reckless in not knowing, the fact that he owed Merrill Lynch a fiduciary duty to maintain such information in confidence until it was publicly disseminated, and that he owed Cinergy shareholders a duty to abstain from disclosing this information for the purpose of obtaining personal gain.

125. In breach of these fiduciary duties or similar relationships of trust or confidence owed to Merrill Lynch and Cinergy shareholders, Shpigelman misappropriated material, non-

public information about Duke's offer to acquire Cinergy, and, while in possession of this information, communicated this information, directly or indirectly, to Plotkin and Pajcin while expecting to benefit from his disclosure.

126. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about Duke's offer to acquire Cinergy from Shpigelman was material and non-public, and had been misappropriated and/or disclosed to them in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or sell any Cinergy securities or tip others so that they could purchase or sell any Cinergy securities while possessing such information.

127. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase Cinergy securities and the profits from those purchases would be shared between them. As described above and in connection with this agreement, Pajcin purchased Cinergy securities while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

128. Also in violation of their respective obligations, Plotkin and Pajcin tipped Lopandic and Verinac to trade in Cinergy securities while expecting to benefit from the disclosure. Plotkin and Pajcin also agreed to share kickbacks received from Lopandic and Verinac for providing this information.

129. Lopandic and Verinac knew, or were reckless in not knowing, that the information they learned about Duke's offer to acquire Cinergy from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or

sell any Cinergy securities or tip others so that they could purchase or sell any Cinergy securities while possessing such information.

130. Notwithstanding their obligations, Lopandic and Verinac tipped Borac and the Direktanlage Traders to trade in Cinergy securities while expecting to benefit from their disclosure.

131. Borac and the Direktanlage Traders each knew, or was reckless in not knowing, that the information they learned about Duke's offer to acquire Cinergy from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Cinergy securities while possessing such information.

132. Notwithstanding their obligations, as described above, Borac and the Direktanlage Traders purchased Cinergy securities while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

133. By the conduct described above, Defendants Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, Borac, and the Direktanlage Traders directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

134. Shpigelman, Pajcin, and Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in Cinergy securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Borac are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Borac's trading in Cinergy securities. Shpigelman, Pajcin, Plotkin, Lopandic, Verinac and the Direktanlage Traders are jointly and

severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage traders' trading in Cinergy securities.

COUNT V

(Trading in LabOne Securities in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Shpigelman, Pajcin, Plotkin, Siegel, Mikhail Plotkin, Lopandic, Verinac, Borac, the Direktanlage Traders, and Anticevic)

135. Paragraphs 1 through 134 are realleged and incorporated herein by reference.

136. Prior to the public announcement of the acquisition of LabOne by Quest on August 8, 2005, information relating to the offer to acquire LabOne was material, non-public information. This information also was considered confidential by Merrill Lynch, and was intended solely for internal corporate use on behalf of its client, Quest.

137. Shpigelman learned of the material, non-public information concerning Quest's offer to acquire LabOne in the course of his employment at Merrill Lynch. Shpigelman further knew, or was reckless in not knowing, the fact that he owed Merrill Lynch a fiduciary duty to maintain such information in confidence until it was publicly disseminated.

138. In breach of a fiduciary duty or similar relationship of trust or confidence owed to Merrill Lynch, Shpigelman misappropriated material, non-public information about Quest's offer to acquire LabOne, and, while in possession of this information, communicated this information, directly or indirectly, to Plotkin and Pajcin, while expecting to benefit from his disclosure.

139. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about Quest's offer to acquire LabOne from Shpigelman was material and non-public, and had been misappropriated and/or disclosed to them in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or sell any LabOne securities or tip others so that they could purchase or sell any LabOne securities while possessing such information.

140. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase LabOne securities and the profits from those trades would be shared between them. As described above and in connection with this agreement, Pajcin purchased LabOne securities through the Anticevic Saxo Bank Account while in possession of this misappropriated, material, non-public information, as set forth on the annexed Exhibit A, which is incorporated herein by reference.

141. Also in violation of their respective obligations, Plotkin and Pajcin tipped Siegel, Mikhail Plotkin, Lopandic, and Verinac to trade in LabOne securities while expecting to benefit from the disclosures. Plotkin and Pajcin also agreed to share kickbacks received from Siegel, Mikhail Plotkin, Lopandic, and Verinac for providing this information.

142. Siegel, Mikhail Plotkin, Lopandic, and Verinac each knew, or was reckless in not knowing, that the information they learned about Quest's offer to acquire LabOne from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any LabOne securities or tip others so that they could purchase or sell any LabOne securities while possessing such information.

143. Notwithstanding their respective obligations, as described above, Siegel and Mikhail Plotkin purchased LabOne securities while in possession of this misappropriated material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

144. Notwithstanding their obligations, Lopandic and Verinac tipped Borac and the Direktanlage Traders to trade in LabOne securities while expecting to benefit from their disclosure.

145. Borac and the Direktanlage Traders knew, or were reckless in not knowing, that the information they learned about Quest's offer to acquire LabOne from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any LabOne securities while possessing such information.

146. Notwithstanding their obligations, as described above, Borac and the Direktanlage Traders purchased LabOne securities while in possession of this misappropriated material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

147. Anticevic knew, or was reckless in not knowing, that the trading performed by Pajcin in her accounts with her express permission was based upon material, non-public information that had been misappropriated and/or disclosed in violation of a duty of trust or confidence.

148. By the conduct described above, Defendants Shpigelman, Pajcin, Plotkin, Siegel, Mikhail Plotkin, Lopandic, Verinac, Borac, the Direktanlage Traders, and Anticevic, directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

149. Shpigelman, Pajcin, Plotkin, and Anticevic are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in LabOne securities through the Anticevic Saxo Bank Account. Shpigelman, Pajcin, Plotkin, and Siegel are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Siegel's trading in LabOne securities. Shpigelman, Pajcin, Plotkin, and Mikhail Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Mikhail Plotkin's trading in

LabOne securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Borac are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Borac's trading in LabOne securities. Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage Traders' trading in LabOne securities.

COUNT VI

(Trading in Reebok Securities in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Shpigelman, Pajcin, Plotkin, Siegel, Santana, Vujovic, Mikhail Plotkin, Lopandic, Verinac, Borac, Sormaz, the Direktanlage Traders, and Anticevic)

150. Paragraphs 1 through 149 are realleged and incorporated herein by reference.

151. Prior to the public announcement of the acquisition of Reebok by Adidas on August 3, 2005, information relating to Adidas' offer to acquire Reebok was material, non-public information. This information also was considered confidential by Merrill Lynch, and was intended solely for internal corporate use on behalf of its client, Adidas.

152. Shpigelman learned of the material, non-public information concerning Adidas' offer to acquire Reebok in the course of his employment at Merrill Lynch. Shpigelman further knew, or was reckless in not knowing, the fact that he owed Merrill Lynch a fiduciary duty to maintain such information in confidence until it was publicly disseminated.

153. In breach of a fiduciary duty or similar relationship of trust or confidence owed to Merrill Lynch, Shpigelman misappropriated material, non-public information about Adidas' offer to acquire Reebok, and, while in possession of this information, communicated this information, directly or indirectly, to Plotkin and Pajcin, while expecting to benefit from his disclosure.

154. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about Adidas' offer to acquire Reebok from Shpigelman was material and non-public, and had been misappropriated and/or disclosed to them in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or sell any Reebok securities or tip others so that they could purchase or sell any Reebok securities while possessing such information.

155. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase Reebok securities and the profits from those trades would be shared between them. As described above and in connection with this agreement, Pajcin purchased Reebok securities through accounts held in the names of Anticevic and Vujovic while in possession of this misappropriated material, non-public information, as set forth on the annexed Exhibit A, which is incorporated herein by reference.

156. Also in violation of their respective obligations, Plotkin and Pajcin tipped Siegel, Santana, Mikhail Plotkin, Lopandic, and Verinac to trade in Reebok securities while expecting to benefit from the disclosures. Plotkin and Pajcin also agreed to share kickbacks received from Siegel, Santana, Mikhail Plotkin, Lopandic, and Verinac for providing this information.

157. Siegel, Santana, Mikhail Plotkin, Lopandic, and Verinac each knew, or was reckless in not knowing, that the information they learned about Adidas' offer to acquire Reebok from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Reebok securities or tip others so that they could purchase or sell any Reebok securities while possessing such information.

158. Notwithstanding their respective obligations, as described above, Siegel, Santana, Mikhail Plotkin, and Lopandic each purchased Reebok securities in their respective accounts while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

159. Also in violation of their obligation, Lopandic and Verinac tipped Borac, Sormaz, and the Direktanlage Traders to trade in Reebok while expecting to benefit from their disclosure.

160. Borac, Sormaz, and the Direktanlage Traders each knew, or was reckless in not knowing, that the information they learned about Adidas' offer to acquire Reebok from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Reebok securities while possessing such information.

161. Notwithstanding their respective obligations, as described above, Borac, Sormaz, and the Direktanlage Traders each purchased Reebok securities while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

162. Anticevic and Vujovic each knew, or was reckless in not knowing, that the trading performed by Pajcin in their respective accounts with their express permission was based upon material, non-public information that had been misappropriated and/or disclosed in violation of a duty of trust or confidence.

163. By the conduct described above, Defendants Shpigelman, Pajcin, Plotkin, Santana, Siegel, Mikhail Plotkin, Lopandic, Verinac, Borac, Sormaz, Anticevic, Vujovic, and the Direktanlage Traders directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

164. Shpigelman, Pajcin, Plotkin, and Anticevic are jointly and severally liable for the disgorgement of all profits realized through Pajcin's trading in Reebok securities through the Anticevic CyberTrader Account and the Anticevic Saxo Bank Account. Shpigelman, Pajcin, Plotkin, and Vujovic are jointly and severally liable for the disgorgement of all profits realized through Pajcin's trading in Reebok securities through the Vujovic Account. Shpigelman, Pajcin, Plotkin, and Lopandic are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Lopandic's trading in Reebok securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Sormaz are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Sormaz' trading in Reebok securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Borac are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Borac's trading in Reebok securities. Shpigelman, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage Traders trading in Reebok securities. Shpigelman, Pajcin, Plotkin and Siegel are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Siegel's trading in Reebok securities. Shpigelman, Pajcin, Plotkin and Santana are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Santana's trading in Reebok securities. Shpigelman, Pajcin, Plotkin and Mikhail Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Mikhail Plotkin's trading in Reebok securities.

COUNT VII

(Trading in Celgene Securities in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Shpigelman, Pajcin, Plotkin, Siegel, Santana, Lopandic, Verinac, Borac, Sormaz, the Direktanlage Traders, and Anticevic)

165. Paragraphs 1 through 164 are realleged and incorporated herein by reference.

166. The existence of negotiations concerning a potential transaction involving Celgene during the summer of 2005 was material, non-public information. This information was also considered confidential by Merrill Lynch, and was intended solely for internal corporate use on behalf of its client, Celgene.

167. Shpigelman learned of the material, non-public information concerning a potential transaction involving Celgene in the course of his employment at Merrill Lynch. Shpigelman further knew, or was reckless in not knowing, the fact that he owed Merrill Lynch a fiduciary duty to maintain such information in confidence until it was publicly disseminated, and that he owed Celgene shareholders a duty to abstain from disclosing this information for the purpose of obtaining personal gain.

168. In breach of these fiduciary duties or similar relationships of trust or confidence owed to Merrill Lynch, and Celgene shareholders, Shpigelman misappropriated material, non-public information about the potential transaction involving Celgene, and, while in possession of this information, communicated this information, directly or indirectly, to Plotkin and Pajcin while expecting to benefit from his disclosure.

169. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about Celgene from Shpigelman was material and non-public, and had been misappropriated by Shpigelman and/or disclosed to them in violation of a duty of trust or confidence, and that they could not purchase or sell any Celgene securities or tip others so that they could purchase or sell any Celgene securities while possessing such information.

170. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase Celgene securities and the profits from those purchases would be shared between them. As described above and in connection with this agreement Pajcin purchased Celgene securities through an account held in the name of Anticevic while in possession of this misappropriated, material, non-public information, as set forth on the annexed Exhibit A, which is incorporated herein by reference.

171. Also in violation of their respective obligations, Plotkin and Pajcin tipped Siegel, Santana, Lopandic, and Verinac to trade in Celgene securities while expecting to benefit from the disclosures. Plotkin and Pajcin also agreed to share kickbacks received from Siegel, Santana, Lopandic, and Verinac for providing this information.

172. Siegel, Santana, Lopandic, and Verinac each knew, or was reckless in not knowing, that the information they learned about Celgene from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Celgene securities or tip others so that they could purchase or sell any Celgene securities while possessing such information.

173. Notwithstanding their respective obligations, Siegel, Santana, and Lopandic each purchased Celgene securities in their respective accounts while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

174. Also in violation of their obligations, Lopandic and Verinac tipped Borac, Sormaz, and the Direktanlage Traders to trade in Celgene while expecting to benefit from their disclosure.

175. Borac, Sormaz, and the Direktanlage Traders each knew, or was reckless in not knowing, that the information they learned about Celgene from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Celgene securities while possessing such information.

176. Notwithstanding their respective obligations, Borac, Sormaz, and the Direktanlage Traders each purchased Celgene securities in their respective accounts while in possession of this misappropriated, material, non-public information as set forth on the annexed Exhibit A, which is incorporated herein by reference.

177. Anticevic knew, or was reckless in not knowing, that the trading performed by Pajcin in her accounts with her express permission was based upon material, non-public information that had been misappropriated and/or disclosed in violation of a duty of trust or confidence.

178. By the conduct described above, Defendants Shpigelman, Pajcin, Plotkin, Santana, Siegel, Lopandic, Verinac, Borac, Sormaz and the Direktanlage Traders, and Anticevic, directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

179. Shpigelman, Pajcin, Plotkin, and Anticevic are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in Celgene securities through the Anticevic Saxo Bank Account. Shpigelman, Pajcin, Plotkin, and Lopandic, are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Lopandic's trading in Celgene securities. Shpigelman, Pajcin, Plotkin, Lopandic, Verinac and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten

profits realized through the Direktanlage Traders' trading in Celgene securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Sormaz are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Sormaz' trading in Celgene securities. Shpigelman, Pajcin, Plotkin, Lopandic and Verinac, and Borac are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Borac's trading in Celgene securities. Shpigelman, Pajcin, Plotkin and Siegel are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Siegel's trading in Celgene securities. Shpigelman, Pajcin, Plotkin and Santana are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Santana's trading in Celgene securities.

COUNT VIII

(BusinessWeek Related Trading from November 2004 through March 2005 in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Shuster, Plotkin, Pajcin, Lopandic, Verinac, and the Direktanlage Traders)

180. Paragraphs 1 through 179 are realleged and incorporated herein by reference.

181. Prior to the public release of BusinessWeek's "Inside Wall Street" column, the contents of the "Inside Wall Street" column are material, non-public information and are the property of BusinessWeek. This information is also considered confidential by Quad and by BusinessWeek's owner and publisher, McGraw-Hill.

182. Shuster learned of the contents of the upcoming "Inside Wall Street" column in the course of his employment at Quad and through misappropriation of confidential property and information from Quad after the termination of his employment. Shuster further knew, or was reckless in not knowing, the fact that he owed Quad, and through Quad, McGraw-Hill, a fiduciary duty to maintain such information in confidence until it became publicly available.

183. In breach of a fiduciary duty or similar relationship of trust or confidence owed to Quad, and through Quad to BusinessWeek's owner and publisher, McGraw-Hill, Shuster

misappropriated material, non-public information concerning the contents of the "Inside Wall Street" column with respect to the following companies: TheStreet.Com, Biolase, Curis, SIPEX, Alltel, Cornell, Spectrum, Arbitron, IMAX, and Impax. Shuster communicated this information, directly or indirectly, to Plotkin and Pajcin, while expecting to benefit from his disclosures.

184. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about the contents of the "Inside Wall Street" column with respect to TheStreet.Com, Biolase, Curis, SIPEX, Alltel, Cornell, Spectrum, Arbitron, IMAX and Impax from Shuster was material and non-public, and had been misappropriated by Shuster, and that they could not purchase or sell any of the securities in these companies or tip others so that they could purchase or sell any of these securities while possessing such information.

185. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would trade in the securities of TheStreet.Com, Biolase, Curis, SIPEX, Alltel, Cornell, Spectrum, Arbitron, IMAX, and Impax based on the information provided by Shuster relating to the contents of the "Inside Wall Street" column, and that the profits from those purchases would be shared between them. As described above and in connection with this agreement Pajcin purchased these securities while in possession of misappropriated, material, non-public information, as set forth on the annexed Exhibit B, which is incorporated herein by reference.

186. Also in violation of their respective obligations, Plotkin and Pajcin agreed to and did tip Lopandic and Verinac to trade in the securities of TheStreet.com, Biolase, Curis, Spectrum, Cornell, SIPEX, Arbitron, and Impax while expecting to benefit from their disclosures. Plotkin and Pajcin also agreed to share kickbacks received from Lopandic and Verinac for providing this information.

187. Lopandic and Verinac knew, or were reckless in not knowing, that the information they learned about the contents of the "Inside Wall Street" column with respect to TheStreet.com, Biolase, Curis, Cornell, SIPEX, Arbitron and Impax from Plotkin and Pajcin on the occasions described above was material and non-public, and had been misappropriated, and that they could not purchase or sell any of these securities while possessing such information.

188. Notwithstanding their obligations, Lopandic and Verinac tipped the Direktanlage Traders to trade in the securities of TheStreet.com, Biolase, Curis, Spectrum, Cornell, SIPEX, Arbitron, and Impax on the occasions described above while expecting to benefit from their disclosures.

189. The Direktanlage Traders knew, or were reckless in not knowing, that the information they learned about the contents of the "Inside Wall Street" column with respect to TheStreet.com, Biolase, Curis, Spectrum, Cornell, SIPEX, Arbitron, and Impax from Lopandic and Verinac was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence and that they could not purchase or sell any of these securities while possessing such information.

190. Notwithstanding their obligations, the Direktanlage Traders purchased the securities of TheStreet.com, Biolase, Curis, Spectrum, Cornell, SIPEX, Arbitron, and Impax while in possession of the misappropriated, material, non-public information as set forth on the annexed Exhibit B, which is incorporated herein by reference.

191. By the conduct described above, Defendants Shuster, Plotkin, Pajcin, Lopandic, Verinac, and the Direktanlage Traders directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

192. Shuster, Pajcin, and Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in the securities of TheStreet.Com, Biolase, Curis, SIPEX, Alltel, Cornell, Spectrum, Arbitron, IMAX, and Impax. Shuster, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage Traders' trading in the securities of TheStreet.com, Biolase, Curis, Spectrum, Cornell, SIPEX, Arbitron, and Impax.

COUNT IX

(BusinessWeek Related Trading from June 2005 through September 2005 in Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Renteria, Pajcin, Plotkin, Siegel, Santana, Vujovic, Mikhail Plotkin, Lopandic, Verinac, Borac, the Direktanlage Traders, and Anticevic)

193. Paragraphs 1 through 192 are realleged and incorporated herein by reference.

194. Prior to the public release of BusinessWeek's "Inside Wall Street" column, the contents of the "Inside Wall Street" column are material, non-public information and are the property of BusinessWeek. This information is also considered confidential by Quad and by BusinessWeek's owner and publisher, McGraw-Hill.

195. Renteria learned of the contents of the upcoming "Inside Wall Street" column in the course of his employment at Quad. Renteria further knew, or was reckless in not knowing, the fact that he owed Quad, and through Quad, McGraw-Hill, a fiduciary duty to maintain such information in confidence until it became publicly available.

196. In breach of a fiduciary duty or similar relationship of trust or confidence owed to Quad, and through Quad to BusinessWeek's owner and publisher, McGraw-Hill, Renteria misappropriated material, non-public information concerning the contents of the "Inside Wall Street" column with respect to the following companies: Perficient, PriceSmart, Alaska Communications, Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom,

Spectrum, Symbol, and Check Point. Renteria communicated this information, except for the information relating to Check Point, directly or indirectly, to Plotkin and Pajcin, while expecting to benefit from his disclosures, and communicated the information relating to Check Point directly or indirectly to Plotkin while expecting to benefit from his disclosure.

197. Plotkin and Pajcin knew, or were reckless in not knowing that the information they learned about the contents of the "Inside Wall Street" column with respect to Perficient, PriceSmart, Alaska Communications, Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom, Spectrum, and Symbol from Renteria was material and non-public, and had been misappropriated by Renteria in breach of a duty of trust or confidence, and that they could not purchase or sell any of the securities in these companies or tip others so that they could purchase or sell any of these securities while possessing such information. Plotkin, in turn, knew, or was reckless in not knowing, that the information he learned about the contents of the "Inside Wall Street" column with respect to Check Point from Renteria was material and non-public, and had been misappropriated by Renteria in breach of a duty of trust or confidence, and that he could not purchase or sell any of the securities in these companies or tip others so that they could purchase or sell any of these securities while possessing such information.

198. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase the securities of Fedex, Mikohn Gaming, Polycom, Spectrum, and Symbol, and that the profits from those purchases would be shared between them. As described above and in connection with this agreement, Pajcin purchased the securities of Fedex, Mikohn Gaming, Polycom and Spectrum through accounts held in Anticevic's name, and purchased the securities of Symbol through accounts held in the name of Anticevic and Vujovic while in possession of

this misappropriated, material, non-public information as set forth on the annexed Exhibit B, which is incorporated herein by reference.

199. Also in violation of their respective obligations, Pajcin and Plotkin tipped:

(1) Siegel to trade in the securities of Perficient, Alaska Communications, Casual Male, FedEx, Energy Conservation, Mikohn Gaming, Polycom, and Spectrum; (2) Santana to trade in the securities of Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom, Spectrum, and Symbol; (3) Mikhail Plotkin to trade in the securities of Perficient and Alaska Communications; (4) Lopandic and Verinac to trade in the securities of Casual Male, Energy Conversion, FedEx, Mikohn Gaming, Perficient, PriceSmart, and Spectrum, while expecting to benefit from their disclosures. In violation of his obligation, Plotkin tipped Mikhail Plotkin to trade in the securities of Check Point while expecting to benefit from his disclosure. Plotkin and Pajcin arranged to share kickbacks with Siegel, Santana, Mikhail Plotkin, Lopandic, and Verinac in exchange for providing this information.

200. Siegel knew, or was reckless in not knowing, that the information he learned about the contents of the "Inside Wall Street" column with respect to Perficient, Alaska Communications, Casual Male, FedEx, Energy Conservation, Mikohn Gaming, Polycom, and Spectrum from Plotkin and Pajcin was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that he could not purchase or sell any of these securities while possessing such information.

201. Notwithstanding his obligation, as described above, Siegel purchased the securities of Perficient, Alaska Communications, Casual Male, FedEx, Energy Conservation, Mikohn Gaming, Polycom, and Spectrum securities while in possession of this misappropriated,

material, non-public information as set forth on Exhibit B, which is incorporated herein by reference.

202. Santana knew, or was reckless in not knowing, that the information he learned about the contents of the "Inside Wall Street" column with respect to Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom, Spectrum, and Symbol from Plotkin and Pajcin was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that he could not purchase or sell any of these securities while possessing such information.

203. Notwithstanding his obligation, as described above, Santana purchased the securities of Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom, Spectrum, and Symbol securities while in possession of this misappropriated, material, non-public information as set forth on Exhibit B, which is incorporated herein by reference.

204. Mikhail Plotkin knew, or was reckless in not knowing, that the information he learned about the contents of the "Inside Wall Street" column with respect to Perficient and Alaska Communications from Plotkin and Pajcin and with respect to Check Point from Plotkin was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that he could not purchase or sell any of these securities while possessing such information.

205. Notwithstanding his obligation, as described above, Mikhail Plotkin purchased the securities of Perficient, Alaska Communications, and Check Point while in possession of the misappropriated, material, non-public information as set forth on Exhibit B, which is incorporated herein by reference.

206. Lopandic and Verinac knew, or were reckless in not knowing, that the information they learned about the contents of the "Inside Wall Street" column with respect to Casual Male, Energy Conversion, FedEx, Mikohn Gaming, Perficient, PriceSmart, and Spectrum from Plotkin and Pajcin was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that they could not purchase or sell any of these securities while possessing such information.

207. Notwithstanding their obligations, Lopandic and Verinac tipped Borac to trade in the securities of Perficient, PriceSmart, FedEx, and Mikohn Gaming, expecting to benefit from their disclosures.

208. Borac knew, or was reckless in not knowing, that the information he learned about the contents of the "Inside Wall Street" column with respect to Perficient, PriceSmart, FedEx, and Mikohn Gaming from Lopandic and Verinac was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that he could not purchase or sell any of these securities while possessing such information.

209. Notwithstanding his obligation, as described above, Borac purchased the securities of Perficient, PriceSmart, FedEx, and Mikohn Gaming while in possession of the misappropriated, material, non-public information as set forth on Exhibit B, which is incorporated herein by reference.

210. In addition, notwithstanding their obligation, Lopandic and Verinac tipped the Direktanlage Traders to trade in Casual Male, Energy Conversion, Mikohn Gaming, and Spectrum, expecting to benefit from their disclosures.

211. The Direktanlage Traders knew, or were reckless in not knowing, that the information they learned about the contents of the "Inside Wall Street" column with respect to

Casual Male, Energy Conversion, Mikohn Gaming, and Spectrum from Lopandic and Verinac was material and non-public, and had been misappropriated in breach of a fiduciary duty or similar duty of trust or confidence, and that they could not purchase or sell any of these securities while possessing such information.

212. Notwithstanding their obligation, as described above, the Direktanlage Traders purchased the securities of Casual Male, Energy Conversion, Mikohn Gaming, and Spectrum securities while in possession of the misappropriated, material, non-public information as set forth on Exhibit B, which is incorporated herein by reference.

213. Anticevic and Vujovic knew, or were reckless in not knowing, that the trading performed by Pajcin in their respective accounts with their express permission was based upon material, non-public information that had been misappropriated and/or disclosed in violation of a fiduciary duty or similar duty of trust or confidence.

214. By the conduct described above, Defendants Renteria, Plotkin, Pajcin, Siegel, Santana, Mikhail Plotkin, Lopandic, Verinac, Borac and the Direktanlage Traders, Anticevic and Vujovic, directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

215. Renteria, Pajcin, Plotkin, and Anticevic are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in the securities of FedEx, Mikohn Gaming, Polycom, Spectrum and Symbol through the accounts held in Anticevic's name. Renteria, Pajcin, Plotkin, and Vujovic are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Pajcin's trading in the securities of Symbol through the Vujovic Account. Renteria, Pajcin, Plotkin, and Siegel are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Siegel's trading in the

securities of Perficient, Alaska Communications, Casual Male, FedEx, Energy Conservation, Mikohn Gaming, Polycom and Spectrum. Renteria, Pajcin, Plotkin, and Santana are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Santana's trading in the securities of Casual Male, FedEx, Energy Conversion, Mikohn Gaming, Polycom, Spectrum and Symbol. Renteria, Pajcin, Plotkin, and Mikhail Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Mikhail Plotkin's trading in the securities of Perficient and Alaska Communications. Renteria, Pajcin, Plotkin, Lopandic and Verinac, and Borac are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Borac's trading in the securities of Perficient, PriceSmart, FedEx and Mikohn Gaming. Renteria, Pajcin, Plotkin, Lopandic, Verinac, and the Direktanlage Traders are jointly and severally liable for the disgorgement of all ill-gotten profits realized through the Direktanlage Traders' trading in the securities of Casual Male, Energy Conversion, Mikohn Gaming and Spectrum. Renteria, Plotkin, and Mikhail Plotkin are jointly and severally liable for the disgorgement of all ill-gotten profits realized through Mikhail Plotkin's trading in the securities of Check Point.

COUNT X

(Trading in Bristol-Myers Securities in Violation of Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendants Smith, Plotkin, Pajcin, Siegel, Anticevic, and Mikhail Plotkin)

216. Paragraphs 1 through 215 are realleged and incorporated herein by reference.

217. Pursuant to Rule 6(e)(2) of the Federal Rules of Criminal Procedure, the oath of secrecy taken by federal grand jurors and the charges given by the judge to grand jurors, grand jurors are obligated to maintain the secrecy of grand jury proceedings, and are prohibited from disclosing matters occurring before a grand jury other than under the specific circumstances set forth in Rule 6(e)(2) of the Federal Rules of Criminal Procedure.

218. Smith learned of matters occurring before a federal grand jury through his service as a grand juror, and, accordingly, was bound by Rule 6(e)(2) of the Federal Rules of Criminal Procedure, his oath, and/or the judge's charges to not disclose this information under any circumstance other than those set forth in Rule 6(e)(2) of the Federal Rules of Criminal Procedure. Smith knew, or was reckless in not knowing, the fact that he owed the United States Government a fiduciary duty to maintain such information in confidence pursuant to these terms.

219. In breach of a fiduciary duty or similar relationship of trust or confidence owed to the United States Government, Smith misappropriated material, non-public information about matters occurring before the grand jury concerning Bristol-Myers by communicating this information, directly or indirectly, to Plotkin and Pajcin, while expecting to benefit from his disclosure.

220. Plotkin and Pajcin knew, or were reckless in not knowing, that the information they learned about Bristol-Myers from Smith was material and non-public, and had been misappropriated and/or disclosed to them in violation of a fiduciary duty or similar relationship of trust or confidence, and that they could not purchase or sell any Bristol-Myers securities or tip others so that they could purchase or sell any Bristol-Myers securities while possessing such information.

221. Notwithstanding their respective obligations, Plotkin and Pajcin agreed that Pajcin would purchase and sell Bristol-Myers securities and the profits from those trades would be shared between them. As described above and in connection with this agreement, Pajcin purchased and sold Bristol-Myers securities through an account in his name and through an account in the name of Anticevic while in possession of this misappropriated material, non-

public information, as set forth on the annexed Exhibit C, which is incorporated herein by reference.

222. Also in violation of their respective obligations, Plotkin and Pajcin tipped Mikhail Plotkin and Siegel to trade in Bristol-Myers securities while expecting to benefit from the disclosures. Plotkin and Pajcin also agreed to share kickbacks received from Mikhail Plotkin and Siegel for providing this information.

223. Mikhail Plotkin and Siegel knew, or were reckless in not knowing, that the information they learned about Bristol-Myers from Plotkin and Pajcin was material and non-public, and had been misappropriated and/or disclosed in violation of a duty of trust or confidence, and that they could not purchase or sell any Bristol-Myers securities while possessing such information.

224. Notwithstanding their respective obligations, as described above, Siegel and Mikhail Plotkin purchased and sold the securities of Bristol-Myers while in possession of this misappropriated, material, non-public information as set forth on Exhibit C, which is incorporated herein by reference.

225. Anticevic knew, or was reckless in not knowing, that the trading performed by Pajcin in her accounts with her express permission was based upon material, non-public information that had been misappropriated and/or disclosed in violation of a duty of trust or confidence.

226. By the conduct described above, Defendants Smith, Plotkin, Pajcin, Siegel, Anticevic, and Mikhail Plotkin directly or indirectly, violated Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

227. Smith, Plotkin, and Pajcin are jointly and severally liable for the disgorgement of any ill-gotten profits realized through Pajcin's trading in Bristol-Myers securities through the Pajcin Account. Smith, Plotkin, Pajcin, and Anticevic are jointly and severally liable for the disgorgement of any ill-gotten profits realized through Pajcin's trading in Bristol-Myers securities through the Anticevic Saxo Bank Account. Smith, Plotkin, Pajcin, and Mikhail Plotkin are jointly and severally liable for the disgorgement of any ill-gotten profits realized through Mikhail Plotkin's trading in Bristol-Myers securities. Smith, Plotkin, Pajcin, and Siegel are jointly and severally liable for the disgorgement of any ill-gotten profits realized through Siegel's trading in Bristol-Myers securities.

COUNT XI

(Violation of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder as to Defendant Smith)

228. Paragraphs 1 through 227 are realleged and incorporated herein by reference.

229. In or about mid to late-2004, Smith provided Pajcin with money for the purpose of funding the Insider Trading Schemes. Pajcin, Plotkin, and Smith agreed that in return for providing this money, Smith would receive a percentage of Pajcin's trading profits related to Smith's contribution to the Insider Trading Schemes.

230. Smith knew, or was reckless in not knowing, that the money he contributed to Pajcin was being used to engage in unlawful insider trading and that Smith's share of profits was to come from such unlawful trading.

231. As described above and in connection with this agreement, Pajcin unlawfully traded various securities as set forth on the annexed Exhibits A, B, and C, which are incorporated herein by reference.

232. By the conduct described above, Defendant Smith directly or indirectly, violated Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

RELIEF SOUGHT

WHEREFORE, the Commission respectfully requests that this Court enter a judgment:

I.

Permanently restraining and enjoining each of the Defendants, Anticevic, Pajcin, Plotkin, Shpigelman, Shuster, Renteria, Siegel, Santana, Vujovic, Mikhail Plotkin, Lopandic, Verinac, Sormaz, Borac, Dilber, Krsic, and Smith, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, and each of them, from violating Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder;

II.

Permanently restraining and enjoining Defendants Shpigelman, Pajcin, and Plotkin, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, and each of them, from violating Section 14(e) of the Exchange Act, and Rule 14e-3 thereunder;

III.

Permanently restraining and enjoining Defendants Anticevic, Pajcin, Plotkin, Siegel, Mikhail Plotkin, and Smith, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of the injunction

by personal service or otherwise, and each of them, from violating Section 17(a) of the Securities Act;

IV.

Directing Defendant Anticevic and each of her financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with her, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Anticevic Saxo Bank Account, and/or in Account #945302193853 at LBIE, as well as the Anticevic Direktanlage Account;

V.

Directing Defendant Lopandic and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Lopandic Account, and/or in Account #945302193853 at LBIE, as well as the Borac Direktanlage Account and the Krsic Direktanlage Account, on which Lopandic was a co-signatory;

VI.

Directing Defendant Borac and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Borac Account, and/or in Account #945302193853 at LBIE, as well as the Borac Direktanlage Account;

VII.

Directing Defendant Sormaz and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Sormaz Account, and/or in Account #945302193853 at LBIE, as well as the Sormaz Direktanlage Account;

VIII.

Directing Defendant Dilber and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Dilber Direktanlage Account;

IX.

Directing Defendant Krsic and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Krsic Direktanlage Account;

X.

Directing Defendant Verinac and each of his financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with him, to repatriate the proceeds of all the unlawful trading set forth herein, including, but not limited to proceeds residing in the Dilber Direktanlage Account, on which Verinac was a co-signatory;

XI.

Ordering Defendants Anticevic, Pajcin, Plotkin, Shpigelman, Shuster, Renteria, Siegel, Santana, Vujovic, Mikhail Plotkin, Lopandic, Verinac, Sormaz, Borac, Dilber, Krsic, and Smith to disgorge all profits realized from all the unlawful trading set forth herein, plus prejudgment interest;

XII.

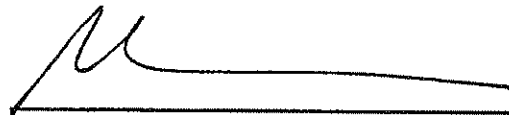
Ordering Defendants Anticevic, Pajcin, Plotkin, Shpigelman, Shuster, Renteria, Siegel, Santana, Vujovic, Mikhail Plotkin, Lopandic, Verinac, Sormaz, Borac, Dilber, Krsic, and Smith to pay civil monetary penalties pursuant to Section 21A and/or Section 21(d)(3) of the Exchange Act; and ordering Defendants Anticevic, Pajcin, Plotkin, Siegel, Mikhail Plotkin, and Smith to

pay civil monetary penalties pursuant to Section 20(c) of the Securities Act; and

XIII.

Granting such other relief as this Court may deem just and appropriate.

Dated: New York, New York
August 30, 2006



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Exhibit A
Defendants' Trading in Connection With Non-Public Merrill Lynch Mergers and Acquisitions Deals

Name	Date	Action	Symbol	Description
David Pajcin	1/26/05 - 1/27/05	Buy	G	38 buy transactions were placed to purchase a total of 346 call options and 3,000 shares
	1/27/2005	Announcement		P&G acquiring Gillette
David Pajcin	1/28/2005	Sell	G	28 sell transactions were placed to sell all 346 call options and all 3,000 shares
Direktanlaga Traders	1/27/2005	Buy	G	13 buy transactions were placed to purchase a total of 13,719 shares
	1/27/2005	Announcement		P&G acquiring Gillette
Direktanlaga Traders	1/28/2005	Sell	G	A series of sell transactions was placed to sell all 13,719 shares
David Pajcin	2/17/2005	Buy	ELAB	65 buy transactions were placed to purchase a total of 50 call options and 21,000 shares
	2/21/2005	Announcement		Novartis to Buy Hexal, Eon Labs for \$8.3 Billion Cash
David Pajcin	2/22/2005	Sell	ELAB	30 sell transactions were placed to sell all 50 call options and all 21,000 shares
Direktanlaga Traders	2/17/2005	Buy	ELAB	15 buy transactions were placed to purchase a total of 25,003 shares
	2/21/2005	Announcement		Novartis to Buy Hexal, Eon Labs for \$8.3 Billion Cash
Direktanlaga Traders	2/22/2005	Sell	ELAB	34 sell transactions were placed to sell all 25,003 shares
David Pajcin	5/4/05 - 5/6/05	Buy	CIN	29 buy transactions were placed to purchase a total of 645 call options and 2,000 shares
	5/9/2005	Announcement		Duke Energy Agrees to Acquire Cinergy
David Pajcin	5/9/2005	Sell	CIN	24 sell transactions were placed to sell all 645 call options and all 2,000 shares
Direktanlaga Traders	5/4/05 - 5/6/05	Buy	CIN	24 buy transactions were placed to purchase a total of 22,727 shares
	5/9/2005	Announcement		Duke Energy Agrees to Acquire Cinergy
Direktanlaga Traders	5/9/2005	Sell	CIN	22 sell transactions were placed to sell all 22,727 shares
Ilija Borac	5/6/2005	Buy	CIN	3 buy transactions were placed to purchase 15,000 shares
	5/9/2005	Announcement		Duke Energy Agrees to Acquire Cinergy
Ilija Borac	5/9/2005	Sell	CIN	3 sell transactions were placed to sell all 15,000 shares
Sonja Anticevic	8/1/05 - 8/2/05	Buy	RBK	33 buy transactions were placed to purchase a total of 1,997 call options and 240 shares
	8/3/2005	Announcement		Adidas to Acquire Reebok
Sonja Anticevic	8/3/2005	Sell	RBK	30 sell transactions were placed to sell all 1,997 call options and all 240 shares
Henry Siegel	8/1/05 - 8/2/05	Buy	RBK	48 buy transactions were placed to purchase a total of 1,180 call options and 8,000 shares
	8/3/2005	Announcement		Adidas to Acquire Reebok
Henry Siegel	8/3/2005	Sell	RBK	60 sell transactions were placed to sell all 1,180 call options and all 8,000 shares
Elvis Santana	8/1/05 - 8/2/05	Buy	RBK	6 buy transactions were placed to purchase a total of 465 call options and 520 shares
	8/3/2005	Announcement		Adidas to Acquire Reebok
Elvis Santana	8/3/2005	Sell	RBK	13 sell transactions were placed to sell all 465 call options and all 520 shares
Direktanlaga Traders	8/2/2005	Buy	RBK	1 buy transaction was placed to purchase a total of 7,545 shares
	8/3/2005	Announcement		Adidas to Acquire Reebok
Direktanlaga Traders	8/3/2005	Sell	RBK	1 sell transaction was placed to sell all 7,545 shares
Monika Vujovic	8/1/2005	Buy	RBK	5 buy transactions were placed to purchase a total of 455 call options
	8/3/2005	Announcement		Adidas to Acquire Reebok
Monika Vujovic	8/3/2005	Sell	RBK	3 sell transactions were placed to sell all 455 call options
Mikhail & Marina Plotkin	8/2/2005	Buy	RBK	3 buy transactions were placed to purchase a total of 60 call options and 120 shares
	8/3/2005	Announcement		Adidas to Acquire Reebok

Exhibit A
Defendants' Trading in Connection With Non-Public Merrill Lynch Mergers and Acquisitions Deals

Mikhail & Marina Plotkin	8/3/2005	Sell	RBK	7 sell transactions were placed to sell all 60 call options and all 120 shares
Ilija Borac	8/1/05 - 8/2/05 8/3/2005	Buy Announcement	RBK	9 buy transactions were placed to purchase a total of 50,000 shares
Ilija Borac	8/3/2005	Sell	RBK	Adidas to Acquire Reebok 9 sell transactions were placed to sell all 50,000 shares
Zoran Sornmaz	8/1/05 - 8/2/05 8/3/2005	Buy Announcement	RBK	6 buy transactions were placed to purchase a total of 40,000 shares
Zoran Sornmaz	8/3/2005	Sell	RBK	Adidas to Acquire Reebok 6 sell transactions were placed to sell all 40,000 shares
Perica Lopandic	8/1/05 - 8/2/05 8/3/2005	Buy Announcement	RBK	7 buy transactions were placed to purchase a total of 55,000 shares
Perica Lopandic	8/3/05 - 8/15/05	Sell	RBK	Adidas to Acquire Reebok 7 sell transactions were placed to sell all 55,000 shares
Direktanlaga Traders	5/23/05 - 6/3/05	Buy	LABS	183 buy transactions were placed to purchase a total of 42,765 shares
Direktanlaga Traders	6/6/05 - 6/7/05 8/8/2005	Sell Announcement	LABS	206 sell transactions were placed to sell all 42,765 shares Quest to Acquire LabOne
Sonja Anticevic	6/3/2005	Buy	LABS	2 buy transactions were placed to purchase a total of 2,300 shares
Sonja Anticevic	6/9/2005 8/8/2005	Sell Announcement	LABS	2 sell transactions were placed to sell all 2,300 shares Quest to Acquire LabOne
Henry Siegel	6/3/2005	Buy	LABS	9 buy transactions were placed to purchase a total of 9,500 shares
Henry Siegel	6/6/2005 8/8/2005	Sell Announcement	LABS	12 sell transactions were placed to sell all 9,500 shares Quest to Acquire LabOne
Ilija Borac	5/25/05-6/1/2005 6/6/2005	Buy Sell	LABS	8 buy transactions were placed to purchase a total of 8,400 shares
Ilija Borac	8/8/2005	Announcement	LABS	8 sell transactions were placed to sell a total of 8,400 shares Quest to Acquire LabOne
Mikhail Plotkin	5/31/2005-6/3/2005	Buy	QLJGH (LabOne)	14 buy transactions were placed to purchase a total of 140 call options
Mikhail Plotkin	6/6/2005-8/8/2005 8/8/2005	Sell Announcement	QLJGH (LabOne)	12 sell transactions were placed to sell all 140 call options Quest to Acquire LabOne
Sonja Anticevic	7/13/2005-7/22/2005	Buy	LQHHI,J,K/CELG	25 buy transactions were placed to purchase a total of 578 call options and 150 shares
Sonja Anticevic	7/15/2005-7/28/2005	Sell	LQHHI,J,K/CELG	18 sell transactions were placed to sell all 578 call options and 150 shares
Henry Siegel	7/15/2005-7/22/2005	Buy	LQHHI,J,K	39 buy transactions were placed to purchase a total of 670 call options
Henry Siegel	7/28/2005-8/01/2005	Sell	LQHHI,J,K	34 sell transactions were placed to sell a total of 650 call options
Elvis Santana	7/15/2005-7/22/2005	Buy	LQHHI,J,K	4 buy transactions were placed to purchase a total of 310 call options
Elvis Santana	7/27/2005-7/28/2005	Sell	LQHHI,J,K	19 sell transactions were placed to sell all 310 call options
Ilija Borac	7/21/2005-7/23/2005	Buy	CELG	8 buy transactions were placed to purchase a total of 40,000 shares
Ilija Borac	7/19/2005-7/25/2005	Sell	CELG	8 sell transactions were placed to sell all 40,000 shares
Zoran Sornmaz	7/21/2005-7/23/2005	Buy	CELG	3 buy transactions were placed to purchase a total of 15,000 shares
Zoran Sornmaz	7/27/2005-8/2/2005	Sell	CELG	3 sell transactions were placed to sell all 15,000 shares
Perica Lopandic	7/15/2005-7/27/2005	Buy	CELG	6 buy transactions were placed to purchase a total of 40,000 shares
Perica Lopandic	7/21/2005-7/27/2005	Sell	CELG	6 sell transactions were placed to sell all 40,000 shares

Exhibit A
Defendants' Trading in Connection With Non-Public Merrill Lynch Mergers and Acquisitions Deals

Direktanlage Traders	7/15/2005-7/22/2005	Buy	CELG	3 buy transactions were placed to purchase a total of 13,000 shares
Direktanlage Traders	7/18/2005-7/25/2005	Sell	CELG	2 sell transactions were placed to sell all 13,000 shares

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

<u>Name</u>	<u>Date</u>	<u>Action</u>	<u>Symbol</u>	<u>Description</u>
David Pajcin	12/16/2004	Buy To Open	.ATAL	14 buy transactions were placed to purchase a total of 370 call options
	12/17/2004	Inside Wall Street		Alltel: Expecting a Call
David Pajcin	12/17/2004	Sell To Close	.ATAK	4 sell transactions were placed to sell all 370 call options
David Pajcin	1/20/2005	Buy	ARB	9 buy transactions were placed to purchase a total of 3,500 shares
	1/21/2005	Inside Wall Street		The Dutch may tune in Arbitron
David Pajcin	1/21/2005	Sell	ARB	5 sell transactions were placed to sell all 3,500 shares
Direktanlaga Traders	1/20/2005	Buy	ARB	2 buy transactions were placed to purchase a total of 18,400 shares
	1/21/2005	Inside Wall Street		The Dutch may tune in Arbitron
Direktanlaga Traders	1/21/05 - 1/25/05	Sell	ARB	4 sell transactions were placed to sell all 18,400 shares
David Pajcin	11/18/2004	Buy	BLTIE	12 buy transactions were placed to purchase a total of 6,000 shares
	11/19/2004	Inside Wall Street		Will More Dentists Ask for Biolase Drills?
David Pajcin	11/19/2004	Sell	BLTIE	13 sell transactions were placed to sell all 6,000 shares
Direktanlaga Traders	11/18/2004	Buy	BLTIE	1 buy transaction was placed to purchase 76,000 shares
	11/19/2004	Inside Wall Street		Will More Dentists Ask for Biolase Drills?
Direktanlaga Traders	11/19/04 - 11/23/04	Sell	BLTIE	3 sell transactions were placed to sell all 76,000 shares
Henry Siegel	6/16/2005	Buy	CMRG	3 buy transactions were placed to purchase a total of 21,000 shares
	6/17/2005	Inside Wall Street		The Big and Tall Stride Into Casual Male
Henry Siegel	6/17/2005	Sell	CMRG	11 sell transactions were placed to sell all 21,000 shares
Elvis Santana	6/16/2005	Buy	CMRG	3 buy transactions were placed to purchase a total of 2,035 shares
	6/17/2005	Inside Wall Street		The Big and Tall Stride Into Casual Male
Elvis Santana	6/17/2005	Sell	CMRG	1 sell transaction was placed to sell all 2,035 shares
Direktanlaga Traders	6/16/2005	Buy	CMRG	2 buy transactions were placed to purchase a total of 40,200 shares
	6/17/2005	Inside Wall Street		The Big and Tall Stride Into Casual Male
Direktanlaga Traders	6/17/2005	Sell	CMRG	2 sell transactions were placed to sell all 40,200 shares
David Pajcin	12/2/2004	Buy	CRIS	27 buy transactions were placed to purchase a total of 10,000 shares
	12/3/2004	Inside Wall Street		Rich Suitors May Come Courting Curis
David Pajcin	12/2/2004*	Sell	CRIS	*In after hours trading, a total of 12 sell transactions were placed to sell all 10,000 shares

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

Direktanlage Traders	12/2/2004	Buy	CRIS	1 buy transactions were placed to purchase a total of 155,065 shares
	12/3/2004	Inside Wall Street		Rich Sultors May Come Courting Curis
Direktanlage Traders	12/3/04 - 12/6/04	Sell	CRIS	2 sell transactions were placed to sell all 155,065 shares
David Pajcin	1/6/2005	Buy	CRN	12 buy transactions were placed to purchase a total of 8,300 shares
	1/7/2005	Inside Wall Street		Cornell may be Poised for a Breakout
David Pajcin	1/7/2005	Sell	CRN	5 sell transactions were placed to sell all 8,300 shares
Direktanlage Traders	1/6/2005	Buy	CRN	30 buy transactions were placed to purchase a total of 26,900 shares
	1/7/2005	Inside Wall Street		Cornell may be Poised for a Breakout
Direktanlage Traders	1/7/05 - 1/10/05	Sell	CRN	24 sell transactions were placed to sell all 26,900 shares
Henry Siegel	6/23/2005	Buy	ENER	10 buy transactions were placed to purchase a total of 9,000 shares
	6/24/2005	Inside Wall Street		Getting Juiced at Energy
Henry Siegel	6/24/2005	Sell	ENER	6 sell transactions were placed to sell all 9,000 shares
Elvis Santana	6/23/2005	Buy	ENER	8 buy transactions were placed to purchase a total of 3,235 shares
	6/24/2005	Inside Wall Street		Getting Juiced at Energy
Elvis Santana	6/24/2005	Sell	ENER	8 sell transactions were placed to sell all 3,235 shares
Direktanlage Traders	6/23/2005	Buy	ENER	1 buy transaction was placed to purchase a total of 22,053 shares
	6/24/2005	Inside Wall Street		Getting Juiced at Energy
Direktanlage Traders	6/24/2005	Sell	ENER	1 sell transaction was placed to sell all 22,053 shares
Henry Siegel	6/16/2005	Buy To Open	FDXGQ	2 buy transactions were placed to purchase a total of 130 call options
	6/17/2005	Inside Wall Street		FedEx: All Set for Takeoff
Henry Siegel	6/17/2005	Sell To Close	FDXGQ	5 sell transactions were placed to sell all 130 call options
Elvis Santana	6/16/2005	Buy To Open	FDXGQ	4 buy transactions were placed to purchase a total of 50 call options
	6/17/2005	Inside Wall Street		FedEx: All Set for Takeoff
Elvis Santana	6/17/2005	Sell To Close	FDXGQ	8 sell transactions were placed to sell all 50 call options
Ilija Borac	6/16/2005	Buy	FDX	2 buy transactions were placed to purchase a total of 2,200 shares
	6/17/2005	Inside Wall Street		FedEx: All Set for Takeoff
Ilija Borac	6/17/2005	Sell	FDX	2 sell transactions were placed to sell all 2,200 shares

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

Sonja Anticevic	6/16/2005	Buy	FDX	12 buy transactions were placed to purchase a total of 8,000 shares
	6/17/2005	Inside Wall Street		FedEx: All Set for Takeoff
Sonja Anticevic	6/17/2005	Sell	FDX	12 sell transactions were placed to sell all 8,000 shares
David Pajcin	2/3/2005	Buy	IMAX	63 buy transactions were placed to purchase a total of 21,000 shares
	2/4/2005	Inside Wall Street		Breathtaking at Imax
David Pajcin	2/3/2005*	Sell	IMAX	*In after hours trading, a total of 21 sell transactions were placed to sell all 21,000 shares
David Pajcin	3/3/2005	Buy	IPXL	69 buy transactions were placed to purchase a total of 11,500 shares
	3/4/2005	Inside Wall Street		The Allure of Impax
David Pajcin	3/3/05* - 3/4/05	Sell	IPXL	*In after hours trading on 3/3/05 and during normal trading hours on 3/4/05, a total of 35 sell transactions were placed to sell all 11,500 shares
Direktanlage Traders	3/3/2005	Buy	IPXL	1 buy transaction was placed to purchase a total of 24,000 shares
	3/4/2005	Inside Wall Street		The Allure of Impax
Direktanlage Traders	3/4/2005	Sell	IPXL	1 sell transaction was placed to sell all 24,000 shares
Henry Siegel	6/30/2005	Buy	PGIC	12 buy transactions were placed to purchase a total of 24,000 shares
	7/1/2005	Inside Wall Street		Two Slot-Machine Giants: A "Prelude to a Kiss?"
Henry Siegel	7/1/05 - 7/8/05	Sell	PGIC	17 sell transactions were placed to sell all 24,000 shares
Sonja Anticevic	6/30/2005	Buy	PGIC	7 buy transactions were placed to purchase a total of 5,336 shares
	7/1/2005	Inside Wall Street		Two Slot-Machine Giants: A "Prelude to a Kiss?"
Sonja Anticevic	6/30/2005*	Sell	PGIC	*In after hours trading, a total of 8 sell transactions were placed to sell all 5,336 shares
Elvis Santana	6/30/2005	Buy	PGIC	3 buy transactions were placed to purchase a total of 5,300 shares
	7/1/2005	Inside Wall Street		Two Slot-Machine Giants: A "Prelude to a Kiss?"
Elvis Santana	7/1/2005	Sell	PGIC	14 sell transactions were placed to sell all 5,300 shares
Ilija Borac	6/30/2005	Buy	PGIC	12 buy transactions were placed to purchase a total of 8,900 shares
	7/1/2005	Inside Wall Street		Two Slot-Machine Giants: A "Prelude to a Kiss?"
Ilija Borac	7/1/2005	Sell	PGIC	12 sell transactions were placed to sell all 8,900 shares
Direktanlage Traders	6/30/2005	Buy	PGIC	1 buy transaction was placed to purchase a total of 7,000 shares

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

Direktanlaga Traders	7/1/2005	Inside Wall Street	PGIC	Two Slot-Machine Giants: A "Prelude to a Kiss?" 1 sell transaction is placed to sell all 7,000 shares
Henry Siegel	7/1/2005	Sell		
Henry Siegel	7/7/2005	Buy	PLCM	4 buy transactions were placed to purchase a total of 10,000 shares
Henry Siegel	7/8/2005	Inside Wall Street		Polycom's Video Conference Picture is Improving
Henry Siegel	7/8/2005	Sell	PLCM	7 sell transactions were placed to sell all 10,000 shares
Sonja Anticevic	7/7/2005	Buy	PLCM	19 buy transactions were placed to purchase a total of 16,091 shares
Sonja Anticevic	7/8/2005	Inside Wall Street		Polycom's Video Conference Picture is Improving
Sonja Anticevic	7/7/05* - 7/8/05	Sell	PLCM	*In after hours trading on 7/7/05 and during normal trading hours on 7/8/05, a total of 11 sell transactions were placed to sell all 16,091 shares
Elvis Santana	7/7/2005	Buy	PLCM	1 buy transaction was placed to purchase a total of 5,500 shares
Elvis Santana	7/8/2005	Inside Wall Street		Polycom's Video Conference Picture is Improving
Elvis Santana	7/8/2005	Sell	PLCM	23 sell transactions were placed to sell all 5,500 shares
Sonja Anticevic	7/28/2005	Buy	SBL	27 buy transactions were placed to purchase a total of 36,500 shares
Sonja Anticevic	7/29/2005	Inside Wall Street		Symbol Looks Vulnerable
Sonja Anticevic	7/29/2005	Sell	SBL	14 sell transactions were placed to sell all 36,500 shares
Monika Vujovic	7/28/2005	Buy	SBL	2 buy transactions were placed to purchase a total of 45 call options
Monika Vujovic	7/29/2005	Inside Wall Street		Symbol Looks Vulnerable
Monika Vujovic	7/29/2005	Sell	SBL	2 sell transactions were placed to sell all 45 call options
Elvis Santana	7/28/2005	Buy	SBL	10 buy transactions were placed to purchase a total of 7,450 shares
Elvis Santana	7/29/2005	Inside Wall Street		Symbol Looks Vulnerable
Elvis Santana	7/29/2005	Sell	SBL	1 sell transaction was placed to sell all 7,450 shares
David Paicin	12/9/2004	Buy	SIPXE	23 buy transactions were placed to purchase a total of 8,500 shares
David Paicin	12/10/2004	Inside Wall Street		Suddenly, Sipex Looks Ripe for Buyout
David Paicin	12/9/2004*	Sell	SIPXE	*In after hours trading, a total of 11 sell transactions were placed to sell all 8,500 shares
Direktanlaga Traders	12/9/2004	Buy	SIPX	1 transaction was placed to purchase a total of 80,000 shares
Direktanlaga Traders	12/10/2004	Inside Wall Street		Suddenly, Sipex Looks Ripe for Buyout

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

Direktanlaga Traders	12/9/04* - 12/13/04	Sell	SIPX	*In after hours trading on 12/9/04 and during normal trading hours thereafter, a total of 3 sell transactions were placed to sell all 80,000 shares
David Pajcin	1/13/2005	Buy	SPPJ	23 buy transactions were placed to purchase a total of 17,000 shares
	1/14/2005	Inside Wall Street		Curing Spectrum's Headaches
David Pajcin	1/13/05* - 1/14/05	Sell	SPPJ	*In after hours trading on 1/13/05 and during normal trading hours on 1/14/05, a total of 33 sell transactions were placed to sell all 17,000 shares
Direktanlaga Traders	1/13/2005	Buy	SPPJ	37 buy transactions were placed to purchase a total of 78,000 shares
	1/14/2005	Inside Wall Street		Curing Spectrum's Headaches
Direktanlaga Traders	1/14/05 - 1/25/05	Sell	SPPJ	79 sell transactions were placed to sell all 78,000 shares
Henry Siegel	7/14/2005	Buy	SPPJ	13 buy transactions were placed to purchase a total of 67,500 shares
	7/15/2005	Inside Wall Street		Spectrum's Cancer Drugs Could Be Winners
Henry Siegel	7/14/2005* - 7/19/05	Sell	SPPJ	*In after hours trading on 7/14/05 and thereafter, a total of 27 sell transactions were placed to sell all 67,500 shares
Sonja Anticevic	7/14/2005	Buy	SPPJ	13 buy transactions were placed to purchase a total of 16,400 shares
	7/15/2005	Inside Wall Street		Spectrum's Cancer Drugs Could Be Winners
Sonja Anticevic	7/14/05* - 7/15/05	Sell	SPPJ	*In after hours trading on 7/14/05 and thereafter, a total of 8 sell transactions were placed to sell all 16,400 shares
Elvis Santana	7/14/2005	Buy	SPPJ	3 buy transactions were placed to purchase a total of 9,200 shares
	7/15/2005	Inside Wall Street		Spectrum's Cancer Drugs Could Be Winners
Elvis Santana	7/14/2005*	Sell	SPPJ	*In after hours trading, a total of 15 sell transactions were placed to sell all 9,200 shares
Direktanlaga Traders	7/14/05 - 7/15/05*	Buy	SPPJ	*During normal trading hours on 7/14/05 and in early trading hours on 7/15/05, 2 buy transactions were placed to purchase a total of 13,700 shares
	7/15/2005	Inside Wall Street		Spectrum's Cancer Drugs Could Be Winners
Direktanlaga Traders	7/15/2005	Sell	SPPJ	1 buy transaction was placed to sell all 13,700 shares
David Pajcin	11/18/2004	Buy	TSCM	6 buy transactions were placed to purchase a total of 6,000 shares
	11/19/2004	Inside Wall Street		Why a Suitor May Click on TheStreet.com

Exhibit B
Defendants' Trading in Connection With Non-Public Business Week Contents

David Palcin	11/19/2004	Sell	TSCM	10 sell transactions were placed to sell all 6,000 shares
Direktanlaga Traders	11/18/2004	Buy	TSCM	1 buy transaction was placed to purchase a total of 500 shares
Direktanlaga Traders	11/19/2004	Inside Wall Street		Why a Suitor May Click on TheStreet.com
	11/19/2004	Sell	TSCM	1 sell transaction was placed to sell all 500 shares
Henry Siegel	6/9/2005	Buy	PRFT	4 buy transactions were placed to purchase a total of 10,000 shares
Henry Siegel	6/10/2005	Inside Wall Street		Happy Surprises at Perficient
	6/10/2005	Sell	PRFT	2 sell transactions were placed to sell all 10,000 shares
Mikhail Plotkin	6/9/2005	Buy	PRFT	4 buy transactions were placed to purchase a total of 4,500 shares
Mikhail Plotkin	6/10/2005	Inside Wall Street		Happy Surprises at Perficient
	6/10/2005	Sell	PRFT	16 sell transactions were placed to sell all 4,500 shares
Ilija Borac	6/9/2005	Buy	PRFT	2 buy transactions were placed to purchase a total of 2,345 shares
Ilija Borac	6/10/2005	Inside Wall Street		Happy Surprises at Perficient
	6/10/2005	Sell	PRFT	2 sell transactions were placed to sell all 2,345 shares
Henry Siegel	6/16/2005	Buy	ALSK	3 buy transactions were placed to purchase a total of 10,000 shares
Henry Siegel	6/17/2005	Inside Wall Street		Heading North to Alaska Communications
	6/17/2005	Sell	ALSK	2 sell transactions were placed to sell all 10,000 shares
Mikhail Plotkin	6/16/2005	Buy	ALSK	7 buy transactions were placed to purchase a total of 4,000 shares
Mikhail Plotkin	6/17/2005	Inside Wall Street		Heading North to Alaska Communications
	6/17/2005	Sell	ALSK	11 sell transactions were placed to sell all 4,000 shares
Mikhail Plotkin	9/29/2005	Buy	CHKP	1 buy transaction was placed to purchase a total of 215 shares
Mikhail Plotkin	9/30/2005	Inside Wall Street		Check Out Check Point
	9/30/2005	Sell	CHKP	1 sell transaction was placed to sell all 215 shares
Ilija Borac	6/9/2005	Buy	PSMT	1 buy transaction was placed to purchase a total of 5,000 shares
Ilija Borac	6/10/2005	Inside Wall Street		PriceSmart May Be For Sale. Will Wal-Mart Go Shopping?
	6/10/2005	Sell	PSMT	1 sell transaction was placed to sell all 5,000 shares

Exhibit C
Defendants' Trading in Connection With Bristol Myers Squibb Grand Jury Proceedings

<u>Name</u>	<u>Date</u>	<u>Action</u>	<u>Symbol</u>	<u>Description</u>
David Pajcin	3/18/2005	Sell Short	BMY	9 short sell transactions were placed to sell all 8,800 shares
David Pajcin	3/22/2005	Buy To Cover	BMY	9 buy transactions were placed to purchase a total of 8,800 shares
Anticevic Foreign	6/9/2005	Sell Short	BMY	6 short sell transactions were placed to sell all 10,500 shares
Anticevic Foreign	6/14/2005	Buy To Cover	BMY	6 buy transactions were placed to purchase a total of 10,500 shares
	6/15/2005	Announcement		BMY Announces Agreement with U.S.
Mikhail Plotkin	6/10/2005	Buy To Open	.BMYUE	2 buy transactions were placed to purchase a total of 50 put options
Mikhail Plotkin	6/14/2005	Sell To Close	.BMYUE	3 sell transactions were placed to sell all 50 put options
	6/15/2005	Announcement		BMY Announces Agreement with U.S.
Henry Siegel	6/10/2005	Bought	.BMYUE	4 buy transactions were placed to purchase a total of 200 put options
Henry Siegel	6/14/2005	Sold	.BMYUE	1 sell transaction was placed to sell all 200 put options
	6/15/2005	Announcement		BMY Announces Agreement with U.S.